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State Archive Preservation Facility
Frequently Asked Questions

Last Updated: 5/6/16
(New Information in Red)

1. How do you plan on mitigating dust from the demolition process and how will you conduct air monitoring to ensure there are no particulate contaminants in the air?

   Methods to minimize dust exposure will be implemented as required by applicable regulations. Dust exposure will be minimized by using the point of contact methods as depicted on the supporting dust management slides provided by the contractor AND a misting machine (not shown but similar to snowmaking machine on the site. The point of contact methods depicted on the slides are required to be in compliance with the "Wisconsin Department of Natural Resources Conservation Practice Standard Dust Control on Construction Sites (1068)"

   Per Ch. NR 447, regulated asbestos-containing materials will be identified by a state-certified asbestos inspector and abated prior to demolition. Lead and other substances in building materials will be controlled by use of standard wet surface methods during demolition to minimize the creation of dust from these materials.

   Contaminants in soil will be addressed by a combination of excavation and off-site disposal or on-site capping, as approved by the Wisconsin Department of Natural Resources (WDNR.) These remediation methods will minimize the long-term exposure of contaminants to humans and the environment. Potential dust created during implementation of these remediation activities will be controlled by use of water for dust suppression.

   Finally, the selected contractor will be providing daily air monitoring of particulates in the air to ensure that the dust mitigation plan is working as planned.

2. Is air monitoring being done daily and by whom?

   Yes, although it is not required by WDNR or USEPA, there has been daily 5 days per week air monitoring. To supplement the air monitoring being done by the building demolition contractor, Environmental Management Consulting, Inc. will be conducting the daily air monitoring.

   a. If so, does this monitoring continue for the entirety of the project?

      No. Air monitoring will be done during the building demolition portion of the project activities. The duration of the monitoring will be determined by DOA based on the results of the monitoring and the building demolition activities.

   b. Are fine particulates being monitored?

      Yes. The air monitoring will utilize equipment that can monitor for PM-10 particulate.

The PM-10 standard includes particles with a diameter of 10 micrometers or less (0.0004 inches or one-seventh the width of a human hair). The instruments will monitor continuously and log data at reoccurring intervals.

c. How and by whom are the results analyzed? -
Environmental Management Consulting, Inc. will download the data from the air monitoring equipment on a daily basis. The reporting of the air monitoring results will be provided to DOA daily.

d. What have been the results of the air monitors?

The air sampling reports performed on site for particulate matter (PM-10) have been below the recommended EPA level of 150 micrograms per cubic meter (ug/ m^3) for 24 hour average.
Please see the link on the State Archive Preservation Facility Project Website for detailed results as follows:

http://doa.wi.gov/Documents/DFM/BSMO/Project 09H2L-02-Air-Monitoring-Results-Oct 12-thru-Nov 16.pdf

Please note that on approximately four occasions the maximum level was measured at a higher level than 150 micrograms per cubic meter (ug/ m^3). These maximums recorded, were short lived, and only recorded over one logging interval. Measurements are logged at five minute intervals. Since the spike in recording was very short no responsive measures were taken. All other measurements, and all daily averages, have been well within/below the EPA recommended level.

3. How do you plan on controlling any runoff to the Yahara River?

Storm water on the site will be controlled as required by Ch. NR 216. Due to the size of the construction site, a storm water permit is required to be obtained from WDNR and a Storm Water Pollution Prevention Plan (SWPPP) will be prepared that specifies the best management practices (BMPs) to be used to minimize the introduction of pollutants to storm water. The BMPs include the identification of storm water outfalls on the property, the use of silt fencing and drain covers to keep potential contaminants on-site, and covering site materials to prevent exposure to storm water. Additionally, site grading and sediment traps will be utilized to minimize potential for offsite sediment migration.

Dewatering that needs to be performed to facilitate construction of subsurface building components will be performed in a manner in compliance with WDNR rules and guidance. Groundwater would either remain on-site or be taken off-site for treatment.

Complaints have been received regarding discharge of dust control water and rainfall water flowing into the Yahara River (it is cloudy looking as it carries silt from the demolition operation). Zero discharge is not a requirement and the project is not out of compliance. The job site catch basin inlets are regularly monitored by DOA, and the Contractor and have also been inspected by DNR to ensure, the filter fabric installed is in order and is performing as expected, which is the case. Sweeping of the impervious surfaces on site is performed to help reduce dust and; removal of silty sludge after water events from around the catch basin silt socks that accumulates as a result of settlement and ponding during the filtering process is completed as it accumulates to minimize run off. In order to address the complaints, the DNR, DOA and Contractor discussed options such as the use of a finer grade fabric at the inlets to remove more sediment, and utilizing sandbags around inlets to allow the water to pool and allow the sediment to settle prior to entering the inlet.

Consideration was given to utilizing sand bags around the inlets, but it was determined the sandbags would not provide sufficient additional filtering and instead act to hamper-site run-off, resulting in ponding water and compromising run-off control. Using finer grade filter fabric was also considered and after discussion, it was determined the finer grade filtering would not perform in a manner considered satisfactory and instead would clog and impede a controlled run-off in a manner similar to sandbagging. Therefore, the existing inlet protection will continue to be monitored.

4. Will the Wisconsin Department of Natural Resources and/or the Environmental Protection Agency continue to be involved in this project moving forward?

   Yes. DNR has regulatory oversight for asbestos, waste management, and storm water programs. DOA will provide regular updates to the DNR per statutory requirements and follow all guidelines, rules, and laws that are required by the DNR on construction sites. DOA will inform EPA on any issues related to management of PCB regulated under the federal Toxic Substances Control Act (TSCA).

5. Were Native American tribes consulted during the process of this project?

   Yes, tribe input was provided through the Wisconsin Historical Society to the A/E team. The proposed project incorporates areas for Native American ceremony which has required extensive dialogue with tribal governments throughout the design process.

6. How will noise pollution be addressed?

   The project will comply with all applicable noise ordinances.

7. The current structure was built during a time when lead-based paints and asbestos were frequently used in construction projects. How does DOA plan to address these materials in the current building?

   Per Ch. NR 447, regulated asbestos-containing materials will be identified by a state-certified asbestos inspector and abated prior to demolition. WDNR Asbestos Inspectors have reviewed this asbestos pre-inspection and their concerns have been sampled and abated. WDNR will walk all buildings prior to demolition to ensure all asbestos control measures (ACM's) have been abated in their entirety. (Assumed) Category I non friable roofing in good condition will be segregated during the demolition process and disposed of as such. Lead and other substances in building materials will be controlled by use of standard wet surface methods during demolition to minimize the creation of dust from these materials.

   DOA's contractor will be removing any asbestos, lights ballasts, lead paint areas, etc. before initiating the physical demolition of the buildings to minimize the likelihood of any of these contaminants being part of the demolition debris.)

8. Please explain why more testing was not done to test the soil and groundwater for PCE contaminants.

   The PCE contamination on the site was first discovered in 1993 during an investigation of a leaking underground storage tank (UST). Subsequent environmental investigation activities focused on the PCE release, which were documented in several reports during 1994, 1995, 1996, 2006 and 2007. In addition to soil and groundwater sampling, these activities included a remediation consisting of excavating the courtyard cistern, where PCE was found at the highest concentration on the site (5,100 micrograms per kilogram), indicating the source area had been identified. Four groundwater monitoring wells in the immediate area of the cistern were installed, and only two of the wells contained groundwater with PCE concentrations exceeding the Ch. NR 140 Enforcement Standard (ES) of 5 micrograms per liter. Although above the ES, the observed concentrations of 20 and 6.4 micrograms per liter indicated that the PCE-contaminated groundwater was confined to the site. The WDNR closed the case in 2007 with inclusion on the GIS Registry to publicly document the residual soil and groundwater contamination allowed to remain on site with the continuing obligation to obtain WDNR permission before installing drinking water wells on the property. As a result of the case being closed, it was not an industry best practice to do further testing.

   In addition, the DNR also reviewed the September 2013 Soils Management Plan and analytical results from the Phase II investigation. In their November 4, 2013 letter to DOA, DNR approved the soils management plan.

9. Please explain why more testing was not done to test the soil and groundwater for PCB contaminants.

   PCBs were initially detected during the excavation of the courtyard cistern, but were not investigated further until the 2013 Phase II ESA when four soil samples were collected in the courtyard area. One sample from the Phase II indicated a Total PCB concentration exceeding the residual contaminant level (RCL) for protection of groundwater. Subsequent groundwater sampling from the same four borings did not indicate detectable levels of PCBs.

   Two other areas sampled for PCBs during Phase II activities did not have any detection for PCB compounds in soil. Due to the absence of PCBs in the soil, subsequent groundwater sampling was not warranted in this area.

   The limited quantity and relatively low concentrations for detections for PCBs indicates that additional sampling in soil and groundwater is not warranted at the site. Results of the sampling events were presented to the WDNR in the Phase II ESA report, and approval of the soils management plan was granted November 4, 2013.

   The Phase II ESA included a hazardous materials inspection/inventory of materials that are known or probable to contain PCB compounds, per WDNR guidance. WDNR did not indicate that additional sampling is required based on the findings of the report, and planned demolition activities at the site. Demolition of building materials will be conducted according to state mandated regulations.

10. Will access to the bike path or sidewalks be obstructed during the demolition or construction?

    No. Access to both sidewalks and the bike path will not be affected during the demolition and construction of this project. The construction crew will include "flaggers" who will ensure safe crossways for pedestrians and bicyclists near the project.

11. Will any views of the Capitol be affected when the building is finished?

    The building will be four stories and comply with all statutes and ordinances governing the height of buildings in that area.

12. How old are the storage tanks on site, and how will they be removed?

    The oldest storage tank currently on the site was installed in 1988 and receives annual inspection from Department of Agriculture, Trade, and Consumer Protection. Fuel tanks on site will be removed following all environmental standards as part of the construction process.

13. The Yahara River has flooded in recent years – do the design plans take this into account?

    Yes, the design plans provide floor elevation above flood level and addresses any potential of site flooding.

14. How will DOA communicate with the community moving forward?

    DOA has established a dedicated website as follows to provide information to interested parties regarding this project. The website will include these FAQs, which will be updated throughout the project, memos to the community, and other pertinent project information.

    http://doa.wi.gov/Divisions/Facilities-Management/Bureau-of-Real-Estate-Management/State-Archive-Preservation-Facility-Project

15. Who can we contact at DOA with any further concerns we may have regarding this project?

    Please call the Department of Administration at (608)266-7362 to reach DOA Communications with any questions or concerns. Email DOACommunications@wisconsin.gov

16. Concern that storm water management will result in the Yahara River Flooding.

    The Yahara River will not flood due to work being conducted at the site. Sediment basins have been designed to slow the rate at which normal storm events discharge into the Yahara River. These basins are also designed to settle out solids carried by the stormwater. The completed site will have a reduced amount of impervious ground surface as compared to the existing site that will help slow and reduce the amount of storm water runoff from the site.

17. Concern about safe asbestos removal –Community members witnessed working with respirators and scraping something from the window frames. They are concerned about the proximity of the scrapping to the bike path.

    The abatement contractor was removing asbestos-containing caulking from the window openings. This work is done inside a regulated area that has restricted access. The workers are required by the OSHA standard to

wear disposable coveralls and respiratory protection while conducting this work. All abatement work is being conducted in accordance with appropriate regulations and health and safety standards which are designed to minimize potential for airborne transport of material being removed. These same standards and practices are protective of the bike path users outside the building.

18. Will contaminated slabs be ground up into little pieces for fill?

    Contaminated slabs will not be ground up and used for fill onsite. If staining on concrete is observed, the material will be appropriately tested to verify that standards for recycling/reuse on site are met. Only concrete which meets the requirements for clean fill will be crushed and remain on site.

19. Who will be directly responsible for stopping work at the location?

    The DFD Project/Construction Representative in accordance with General Conditions of the Contract Article 27.A, is directly responsible for stopping work at the site.

20. Who will be conducting the appropriate sampling?

    Licensed and certified independent environmental consultants familiar with the project site and project requirements will conduct sampling.

21. Who decides which analyses are run on the soil and groundwater samples?

    Additional soil and groundwater analysis will be conducted by the environmental consultant based on excavation location and 1) corresponding historical facility use at that location, 2) historical laboratory data from previous environmental investigations, and 3) physical (visual, olfactory) indicators at the location of impacted media. This approach is consistent with standard industry practice for characterizing potentially impacted media.

22. Who will notify the WDNR of a new site response action?

    Notification of a previously undocumented condition will be reported to the WDNR (and DATCP as needed) through the DFD Project Manager.

23. Who is the contact in the WDNR?

    There are three contacts that have been identified:

    For PCB and EPA contacts:
    Edward K. Lynch, PE, Chief
    Hazardous Waste and Mining Section – WA/5101 South Webster Street
    Madison, Wisconsin 53707
    Phone: 608 267-0545
    Edward.Lynch@wisconsin.gov

For Remediation and Redevelopment:
Mr. Michael Schmoller
Hydrogeologist
Remediation and Redevelopment Program
WDNR South Central Region
3911 Fish Hatchery Road
Fitchburg, WI 53711
Phone: 608-275-3303
Michael.Schmoller@wisconsin.gov

For Asbestos Abatement:
Mark R. Davis
Air Management Specialist
Air Management Program
WDNR Waukesha Service Center
141 N. W. Barstow Street – Room 180
Waukesha, Wisconsin 53188
Phone: 262-574-2118
mark.davis@wisconsin.gov

24. How can we be assured that all necessary contaminants are characterized correctly? Who will determine the extent and degree of the contamination?

    Environmental assessments and investigations conducted to date, including the Phase I and II ESAs, have followed appropriate standards and typical industry practice to identify and characterize potentially impacted media. All remediation and redevelopment (R&R) cases assigned to the site have achieved "Closed" or "No Further Action" status following a WDNR review which includes an evaluation for whether contaminants have been characterized appropriately. Environmental reports (i.e. Phase I & II ESAs, Soils Management Plan) have also been provided to USEPA. In the event an undocumented release is discovered at the site, soil and groundwater analysis will be conducted by an independent environmental consultant as needed based on excavation location, corresponding historical facility use at that location, and other physical (visual, olfactory) indicators. Sampling events to determine the characterization, extent, and degree of contaminated media associated with a previously undocumented release or condition will be subject to the WDNR notification, review, and acceptance process.

25. Who decides the ultimate fate of the contaminated soil (stockpiling and off-site disposal?)

    Soil that is disposed off site will be subject to waste profiling and characterization requirements of the end-point disposal facility. The contractor is responsible for storage on site as well as the disposal of stockpiled contaminated soils at an appropriate off-site facility. Storage and disposal must comply with applicable rules and regulations.

26. Is there an updated demolition timeline?

    No, Demolition has begun and is scheduled to conclude in January of 2016. Construction of the new facility will begin shortly thereafter.

27. What are the hours/days of operation for the project?
    Activity will begin no earlier than 6:30 AM and will cease no later than 7:00 PM.
    Typical work day is Monday through Friday.

28. What are the quiet hours?
    Prior to 7:00 AM no loud activities in excess of 70 Decibels measured outside the project site.

29. Neighbors are concerned about the vibrations from the construction cracking the foundations of the old homes in the neighborhood. Is there any protocol to take into account the surrounding buildings during construction?
    A seismograph will monitor magnitude of vibrations using peak particle velocity (PPV) and automatically notify the construction superintendent if the transverse waves exceed 0.500 in/second (IPS). Aesthetic damage can occur on houses that are poorly maintained, or with brittle plaster walls, once the PPV approaches 1.0 IPS. The notification level is well below that value. Sound residential structures have damage threshold values of 2.0 IPS, and commercial structures are at 4.0 IPS.

30. Concerns regarding the planned disposition of the rubble in reference to the photo taken at the site below.

    The concrete, plastic, and rusty pipe in the referenced picture is located in an area which had no detectable concentrations of PCBs in soil from the Phase II ESA sampling event. The material indicates no observable staining other than from contact with the exterior of the rusted pipe embedded in the concrete. The material will be disposed along with other demolition debris from the project at an appropriate offsite facility.

31. In the "Project Update" document on the project website, dated 8/27/15, the document states that "DOA's contractors will be following an erosion plan, which includes daily monitoring and reporting of the containment barriers." - New

    This is a correct statement. Monitoring has been performed by contractors throughout the demolition process.

32. What is the stormwater plan during construction? - New

    The construction will be in compliance with the WPDES General Permit granted by the Wisconsin DNR. This permit requires the erosion control storm water management to be implemented and maintained throughout construction. Routine inspections and documentation provided to Division of Facilities Development is required.

33. Will there be a stormwater pond? – New

    The erosion control plan includes installation of a temporary sediment trap.

34. When will the stormwater management and erosion controls be implemented? - New

    The stormwater management and erosion controls were implemented when demolition work began and will continue throughout construction until the project is completed.

35. What is the stormwater plan for the final building? – New

    The storm water is directed to detention structures buried below grade. This allows suspended solids in the water to settle out before discharging off site.

36. Is it just underground storage tanks? - New

    The east side of the site is surface drained over lawn and landscaped.

37. If so, could surface water features be used in addition? - New

    There will not be any surface water features after the removal of the temporary sediment trap.

38. Will the slabs be tested for asbestos? - New

    There is no requirement or regulation for concrete to be tested for asbestos. Further there is no reason to suspect that the concrete slab contains asbestos.

39. How will the dust be controlled while the slabs are being ground? - New

    In accordance with WDNR Conservation Practice Standard Dust Control on Construction Sites (1068), JPC will do all of the following:

    - Operate equipment so as to keep dust and dirt to a minimum.
    - Use water mist and other suitable methods to limit the spread of dust and dirt.
    - Comply with governing environmental-protection regulations.
    - Refrain from using water when it may damage adjacent construction or create hazardous or objectionable conditions, such as ice, flooding, or pollution.

40. How will the ground slabs be stored? - New

    In general, the vast majority of the demolished materials will either be concrete, asphalt, or steel reinforcing. The concrete and asphalt will be crushed on site and utilized as subgrade materials primarily under new pavements or under new slab on grades. The rebar will be sent to a steel recycling center.

41. What will be done with the soil under the slab? Will it be tested? How will it be stored? - New

    None of the soil or materials on site following completion of the above grade structure demolition has been shown to contain constituents at levels which indicate any existing material is characteristically hazardous. If material is sampled, analyzed, and is found to contain material which is characteristically hazardous, then that material will be disposed of as hazardous waste.

    As work progresses, if discolored or odorous ground water is observed, dewatering operations will terminate, and it will be reported to DFD.

    During subsequent construction activities, if there are indications of a previously unknown release (stained soils, odor, etc.) additional sampling will be conducted to determine the nature of contamination. If a previously unknown release is identified, the DFD, and subsequently the WDNR, will be notified in accordance with all applicable rules and regulations. At this time there is no additional data to indicate a new release.

    Hazardous materials, if discovered during the course of site activities, will be removed by a DFD certified contractor prior to or during demolition.

    Completion of construction will result in an engineered cap providing a barrier layer to prevent direct contact with contaminated soils, as a result of legacy pollutants, remaining onsite. This consists of the building slab, paving imported soils, and seeding for landscaping to prevent direct contact with soils.

42. Was the City of Madison's comprehensive plan calling for greenspace considered during design? - New
    The site development was subject to evaluation by the City of Madison prior to demolition.

43. Where will the driveways be placed? - New
    The new driveways will be placed at the existing driveway locations in accordance with the review by the City of Madison prior to demolition.

44. Will the driveways cross the bike path? – New
    The existing conditions of traffic and bike path will remain unchanged.

45. Now that the barbed wire has been removed, how will the site be kept secure during construction? - New
    A gated fence will surround the perimeter of the entire site throughout construction.

46. Please answer questions below regarding the Phase II ESA Report - New

Table 1 12/17/2015. Table 1. Data Irregularities found in the Phase II ESA Report (September 2013) by Ayres Associates on Behalf of the DOA. MB Miller 12/17/2015

Example Letter ID	Compound of Concern	Chain #	Boring Number & (depth) Lab Number	COC and Pace Sample Check Sheet	Pace Results (Lab Sheet)	Data Presentation in table (Table XX)	Data Presentation in Text (page)	Comments: ********** Also Note: Issues with the data that need to be addressed include those cells which are shaded.	Investigate further?
A	PCBs	4079703 Page 237	GP-2 (No depth) 4079703-002	No depths on soil sample labels or chain.	No depths on soil sample in Lab Results.	Table 1D, page 33. Results for GP-2, PCBs, presented in 5-7 foot depth column. Potential error in data presentation.	Pages 5, 6, 7, 9, 11, 12, 16, 17, 21, 23.	The other two analyses done for GP-2, 407970-3-002 were reported in the 0-2 foot column of PAH and Metals in Soil. ..... Also notice that sample 4079703-017 was labeled "GP-2 (d)" and measured for PAHs and reported in 10 to 12 foot column.	YES, obtain data from Pace Anaytical of Green Bay, WI for 4079703. Their phone is 920-469-2438.
B	PCBs	4080092 Page 265	GP-2 (0 - 2 feet) 4080092-002	Note: Sample Labeled "0 to 2 feet"	No Lab Results reported in Phase II ESA.	Reported Correctly?	?	Since there was no Pace Lab sheet, it is not possible to know if the results were reported correctly.	YES, obtain data from Pace for 4080092.
C	Arsenic	4080092 Page 265	GP-1 (4 - 6 feet) 4080092-001	Samples Received @ 25 deg C	No Lab Results reported in Phase II ESA.	NOT Reported in Table 1C.	NOT Reported in TEXT.	Pace sample check in sheet has verbal okay from Mitchell Banach of Ayres to run samples despite delivery temperature.	YES, obtain data from Pace for 4080092
D	Arsenic Lead	4080092 Page 265	GP-3, GP-4 GP-5, GP-6	Samples Received @ 25 deg C	No Lab Results reported in Phase II ESA.	All borings reported correct elements according to chain. See Table 1C in report.	Reported results in Table 1 C eventhough NO Pace Lab Results in the Phase II ESA Report.	Pace sample check in sheet has verbal okay from Mitchell Banach of Ayres to run samples despite delivery temperature.	YES, obtain data from Pace for 4080092
E	PAHs VOCs	4079685 Page 160	GP-19 4079685-008	No Issue	Issue: See comments	Issue: See comments, all data in Table 1A (VOC in Soil) are suspect.	Issue: See comments	The one compound that is measured by both the PAH test (EPA 8270) and VOC test (EPA 8260) is napthalene. ********** 4079685-008 has a reading of 0.0649 mg Naphthalene per kilo of soil in Table 1 A for VOCs, and the SAME SAMPLE has a value reported of 1.62 mg/kg on Table 1B (PAHs). Difference between samples is 25 times difference in concentration.	YES Recheck all VOC results in the soil Table 1 A. There was no other VOC hits (out of 13 total VOC tests) in the whole Phase II report. Dilution Factor problem?
F	TCLP Lead	4080129 Page 266 - 268	GP-13 and GP-14	No Issue	No Lab Results reported in Phase II ESA.	Okay reported in Table 1C	Pages 7, 8, 15, 21, 23, 32	Never seen this before.... Evidently Ayres called in to get TCLP run on high Lead samples. ..... So Pace lab renumbered the old 4079703 to a new Chain Number (4080129). Usually a note is put on the Check in sheet describing who and when.	YES, obtain data from Pace for 4080129.

Response: (In Summary Table Format to correspond with table above)

Table 1 Example Letter ID	Summary of Comments	Response
A	Soil sample GP-2 on chain of custody (COC) #4079703 does not have the depth of the sample listed. Table 1D of the Phase II ESA report identifies that GP-2 soil was analyzed for polychlorinated biphenyls (PCBs) at depth intervals of 0-2' and 5-7'. There may be a potential error in data presentation.	The 5-7' interval for GP-2 was submitted to the laboratory under COC #4079703 on 6/15/13, and the depth interval was not noted. GP-2 (0-2') was submitted to the laboratory under COC #4080092 on 6/21/13, and was identified with the 0-2' depth in the sample name. Soil samples from both the 0-2' and 5-7' intervals were analyzed for PCBs, and were reported accurately in Table 1D of the Phase II ESA report.
B	The laboratory analytical report including soil sample GP-2 (0-2') on COC #4080092, analyzed for PCBs, was not attached to the Phase II ESA report.	The laboratory analytical report was inadvertently not included with the Phase II ESA report. However, the results of the analysis are accurately presented in Table 1D.
C	Laboratory analytical results for soil sample GP-1 (4-6') submitted under COC #4080092 were not attached to the report, and the summary of the analytical results was not included in Phase II ESA summary tables. Arsenic is identified as the compound of concern. The temperature of samples received by the laboratory was also measured at 25°C, which is outside of the range of 0 to 6°C desired for preservation.	The laboratory analytical report and result for arsenic in soil sample GP-1 (4-6') were inadvertently not included in the report. The arsenic concentration for soil sample GP-1 (4-6') is 3.1 milligrams per kilogram (mg/kg), which is below the state-wide background threshold value of 8 mg/kg. Samples listed on COC #4080092 were shipped on a Friday, and were not delivered by the shipping vendor in time for Saturday acceptance at the lab. The samples were received by the laboratory on Monday. The additional transit time over the weekend allowed the cooler ice to melt. Potential impacts to the integrity of the analytical data are improbable due to proper sample packaging and the short duration outside of the optimum preservation temperature range.
D	Laboratory analytical results for soil samples GP-3, GP-4, GP-5 and GP-6, submitted under COC #4080092 were not attached to the Phase II ESA report. Arsenic and lead are identified as the compounds of concern.	Listed samples GP-3, GP-4, GP-5 and GP-6, were submitted under COC# 4079703. The analytical report was included, and sample results accurately reported in the Phase II ESA.
E	All VOC data summarized in Table 1A of the Phase II ESA report is suspect because for soil sample GP-19 (2-4'),	Differences in concentrations when comparing PAH and VOC analytical results for naphthalene (from the same sample) is a common

Table 1 Example Letter ID	Summary of Comments	Response
	naphthalene concentration measured in the volatile organic compound (VOC) spectrum was 0.0649 mg/kg but was found at a concentration of 1.62 mg/kg (approximately 25 times higher) when measured in the polynuclear aromatic hydrocarbon (PAH) or semivolatile spectrum. Samples submitted under COC #4079685.	occurrence. The difference in concentration between the two results is attributed to the different analytical methodology, sample extraction efficiency, and preservation methods. PAH analysis uses a dual solvent process which includes acetone and methylene chloride. VOC analysis uses methanol during analysis. The results of the respective analyses for the soil sample are accurately presented in the Phase II ESA.
F	The laboratory analytical report with results for a toxicity characteristic leaching procedure (TCLP) of soil samples GP-13 and GP-14, submitted under COC #4080129, was not attached to the Phase II ESA report.	The laboratory analytical report was inadvertently not included with the Phase II ESA. However, the results of the analysis are accurately presented in Table 1C.

47. On April 14, 2016, contractors found structures next to the bike path that they did not know existed and observed oils on and near the structures. The following questions are related to this event: - New

    a. Was the slab/concrete floor of the former buildings tested before being drilled and broken apart?

    Asbestos containing material (mastic, expansion joints, etc.) on surface of the concrete floor slabs was properly tested and abated prior to demolition. The concrete surface which came into contact with the asbestos-containing material was properly cleaned prior to demolition.

    No other testing was required or conducted for the slab/concrete floor.

    b. What is the unknown structure and was it tested before drilling, etc. was begun?

    The exact function of the concrete structure is not known. Given the dimensions of the structure, and rebar present in the concrete, it is assumed to be a foundation for a piece of heavy equipment or process historically used at the facility.

    No testing was conducted. This was clean concrete which exhibited no signs of a release or other indications of impacted surfaces other than the interior of the 2-inch holes with an oily substance present. Drilling (jackhammering) proceeded cautiously to determine the nature and extent of the holes and any potential reservoirs near or under the concrete.

Results of drilling found that the oily substance was isolated to 22 two-inch diameter pipes approximately 12-inches in vertical depth encased in the concrete. The contents of the pipe included an oily substance with a look, odor, and viscosity consistent with used motor oil. Estimated total combined quantity of material from the 22 pipes is: one-gallon of free liquid, and 3-gallons of sand/liquid mixture (the sand was introduced from the top of the pipe). A release to the environment from these embedded pipes was not observed.

Once removed from the concrete, the pipes and material were properly segregated and containerized. Characterization results from the sampling indicate low level detections for VOCs, no PCB detections, and a flashpoint > 140 F. The material will be properly disposed by a licensed contractor.

c. Have the soils around and under the slab/concrete floor been tested?

There have been no indications of a release onsite that would require sampling of the soil adjacent to, or beneath, the concrete structure. The liquid/sand mixture from the pipes encased in the concrete structure were sampled for disposal purposes. This material has been properly removed from the area and containerized. The material will be properly disposed by a licensed contractor.

48. There are huge mounds of detritus on the site off Dickinson Street and the City bike path. - New
    a. Of what are these mounds composed?

    Clean concrete, pulverized and stockpiled as part of the demolition, are currently present at the site in the noted location.

    b. Have the contents of these mounds been tested?

    No testing was conducted. This was clean concrete which exhibited no signs of a release or other indications of impacted surfaces which would require testing.

    c. How long will these mounds be <u>exposed</u> to the elements?

    The stockpile present at the site is continuously being utilized, and material transported for use as structural backfill. Estimated duration until the stockpile is depleted in 3-6 weeks as construction progresses on-site.

    d. I understand that these materials will be re-buried onsite. Where?

    Clean concrete, pulverized as part of the demolition, will be used as structural backfill used under the building foundation and other load-bearing surfaces on-site.